

ANN BAVENDER*
 ANNE GOODWIN CRUMP
 VINCENT J. CURTIS, JR.
 RICHARD J. ESTEVEZ
 PAUL J. FELDMAN
 RICHARD HILDRETH
 FRANK R. JAZZO
 ANDREW S. KERSTING
 EUGENE M. LAWSON, JR.
 SUSAN A. MARSHALL*
 HARRY C. MARTIN
 GEORGE PETRUTSAS
 RAYMOND J. QUIANZON
 LEONARD R. RAISH
 JAMES P. RILEY
 KATHLEEN VICTORY
 HOWARD M. WEISS
 ALISON J. SHAPIRO

* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & F

ATTORNEYS AT

11th FLOOR, 1300 NORTH 17th STREET

ARLINGTON, VIRGINIA 22209-3801

(703) 812-0400

TELECOPIER

(703) 812-0486

INTERNET

www.fhh-telcomlaw.com

SFED - 19891020AAX

VICTORIA, TX

VICTORIA RADIOWORKS, LTD.

74862

KEPG

(1930-1977)
 RUSSELL ROWELL
 (1948-1977)

EDWARD F. KENEHAN
 (1960-1978)

CONSULTANT FOR INTERNATIONAL AND
 INTERGOVERNMENTAL AFFAIRS
 SHELDON J. KRYS
 U. S. AMBASSADOR (ret.)

OF COUNSEL
 EDWARD A. CAINE*
 MITCHELL LAZARUS*
 EDWARD S. O'NEILL*
 JOHN JOSEPH SMITH

WRITER'S DIRECT

October 19, 1999

(703) 812-0415

martin@fhh-telcomlaw.com

BY FEDERAL EXPRESS

Federal Communications Commission
 Mass Media Services
 P.O. Box 358195
 Pittsburgh, PA 15251-5195

Re: Station KEPG, Victoria, Texas


Dear Sir/Madam:

Transmitted herewith in triplicate on behalf of Victoria RadioWorks, Ltd. is an application for minor changes to the facilities of Station KEPG, Victoria, Texas. A filing fee check in the amount of \$725 and the requisite FCC Form 159 accompany this application.

Please date-stamp the enclosed courtesy copy and return it to us in the self-addressed, postage-prepaid envelope provided.

Should any question arise concerning this matter, please communicate with the undersigned.

Very truly yours,



Harry C. Martin
 Counsel for Victoria RadioWorks, Ltd.

HCM:mah
 Enclosure

DOCKET FILE COPY ORIGINAL

99-342

RM - 0844

COPY
FCC Form 301
306-0027

FOR
FCC
USE
ONLY

FCC 301

APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

FOR COMMISSION USE ONLY
FILE NO.

Section I - General Information

1. Legal Name of the Applicant Victoria RadioWorks, Ltd.		
Mailing Address 8023 Vantage Drive, Suite 840		
City San Antonio	State or Country (if foreign address) TX	ZIP Code 78230
Telephone Number (include area code) (210) 340-7080		E-Mail Address (if available)
Call Sign KEPG	Facility ID Number 74362	
2. Contact Representative (if other than applicant) Harry C. Martin, Esquire		Firm or Company Name Fletcher, Heald & Hildreth, P.L.C.
Telephone Number (include area code) (703) 812-0415		E-Mail Address (if available) martin@fhh-telcomlaw.com

3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114):

☐ Governmental Entity ☐ Other _____

4. Application Purpose.

- | | |
|---|--|
| <input type="checkbox"/> New station | <input type="checkbox"/> Major Modification of construction permit |
| <input type="checkbox"/> Major Change in licensed facility | <input type="checkbox"/> Minor Modification of construction permit |
| <input checked="" type="checkbox"/> Minor Change in licensed facility | <input type="checkbox"/> Major Amendment to pending application |
| | <input type="checkbox"/> Minor Amendment to pending application |

a. File number of original construction permit: _____ ☒ N/A

b. Service Type: ☐ AM ☒ FM ☐ TV ☐ DTV

c. Community of License:

City Victoria	State TX
------------------	-------------

d. Facility Type: ☒ Main ☐ Auxiliary

If an amendment, submit as an Exhibit a listing by Section and Question Number of the portions of the pending application that are being revised.

Exhibit No. N/A

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1. **Certification.** Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets. ☒ Yes ☐ No

2. Parties to the Application.

- a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.

(1) Name and address of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.

(2) Citizenship.

(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, etc.

(4) Percentage of votes.

(5) Percentage of equity.

(1)	(2)	(3)	(4)	(5)

- b. Applicant certifies that equity interests not set forth above are non-attributable.

☐ Yes ☐ No

☐ N/A

See Explanation in Exhibit No.

3. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.

Exhibit No.

☐ N/A

4. Multiple Ownership.

- a. Applicant certifies that the proposed facility:

☒ Yes ☐ No


See Explanation in Exhibit No.
N/A

- complies with the Commission's multiple and cross-ownership rules;
- does not present an issue under the Commission's cross-interest policy;
- does not present an issue under the Commission's policies relating to media interests of immediate family members;
- complies with the Commission's policies relating to future ownership interests; and
- complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.

Section II - Legal

- b. **Radio Applicants Only.** If the grant of the application would result in certain principal community service contour overlaps, see Local Radio Ownership Worksheet, Question 1, applicant certifies that all relevant information has been placed in public inspection file(s) and submitted to the Commission. ☒ Yes ☐ No ☐ N/A See Explanation in Exhibit No. 1
5. **Character Issues.** Applicant certifies that neither applicant nor any party to the application has or has had any interest in, or connection with: ☐ Yes ☐ No See Explanation in Exhibit No.
- a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or
- b. any pending broadcast application in which character issues have been raised.
6. **Adverse Findings.** Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination. ☐ Yes ☐ No See Explanation in Exhibit No.
7. **Alien Ownership and Control.** Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments. ☐ Yes ☐ No See Explanation in Exhibit No.
8. **Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area. ☐ Yes ☐ No
9. **Local Public Notice.** Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580. ☐ Yes ☐ No
10. **Auction Authorization.** If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable. ☐ Yes ☐ No ☐ N/A
- Exhibit No.
- An exhibit is required unless this question is inapplicable.
11. **Anti-Drug Abuse Act Certification.** Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862. ☒ Yes ☐ No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing John W. Barger	Typed or Printed Title of Person Signing President of General Partner
Signature 	Date October 15, 1999

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT
(U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibit 1

MULTIPLE OWNERSHIP

The attached overlap study, which was included with BALH-980827EJ (granted January 29, 1999), demonstrates that KEPG's overlaps with commonly-owned stations KVIC, KPLV and KAMG were consistent with the multiple ownership rules with KEPG operating as a Class A Station. Since KEPG's city-grade contour overlapped these stations when the study was done, and no other stations have been acquired in the Victoria area, the requirements of the duopoly rule also are met with KEPG operating as a Class C-3 station.

"PLEASE STAMP"

AND RETURN

THIS COPY TO

FLETCHER, HEALD & HILDRETH

MARKET OVERLAP REPORT

The purpose of this report is to demonstrate the overlap and establish the number of stations in the market created by the overlap of the city grade contours of the commonly owned stations in accordance with FCC §73.3555. The stations to be commonly owned are:

1. KVIC (FM) Victoria, TX
2. KPLV (FM) Port Lavaca, TX
3. KEPG (FM) Victoria, TX
4. KAMG (AM) Victoria, TX

RECEIVED

SEP 25 1998

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY


The study was made by calculating contours. The FM contours were calculated by use of the NGDC 30 second database in accordance with in §73.313 of FCC Rules. Where another transmitter site was located within the city grade contour of the stations studied, the contour was not calculated but assumed to overlap.

The stations and pertinent data (location, frequency, power, coordinates, distance to contour) for the stations in the market also is attached. The complete coverage map shows above list of stations in dot contour, FM in solid contour, and AM in dashed contour. As shown by this coverage map, the market created by the city grade contours of the commonly owned stations has 17 licensed commercial radio stations.

According to the FCC §73.3555(a)(1)(iv), in a radio market of 17 commercial radio stations, a party may own 6 stations with 4 of one service. The proposal has 4 stations with 3 in one service, therefore this proposal is in compliance with FCC Rules

The data contained herein is true and correct as to my knowledge and belief.

September 23, 1998

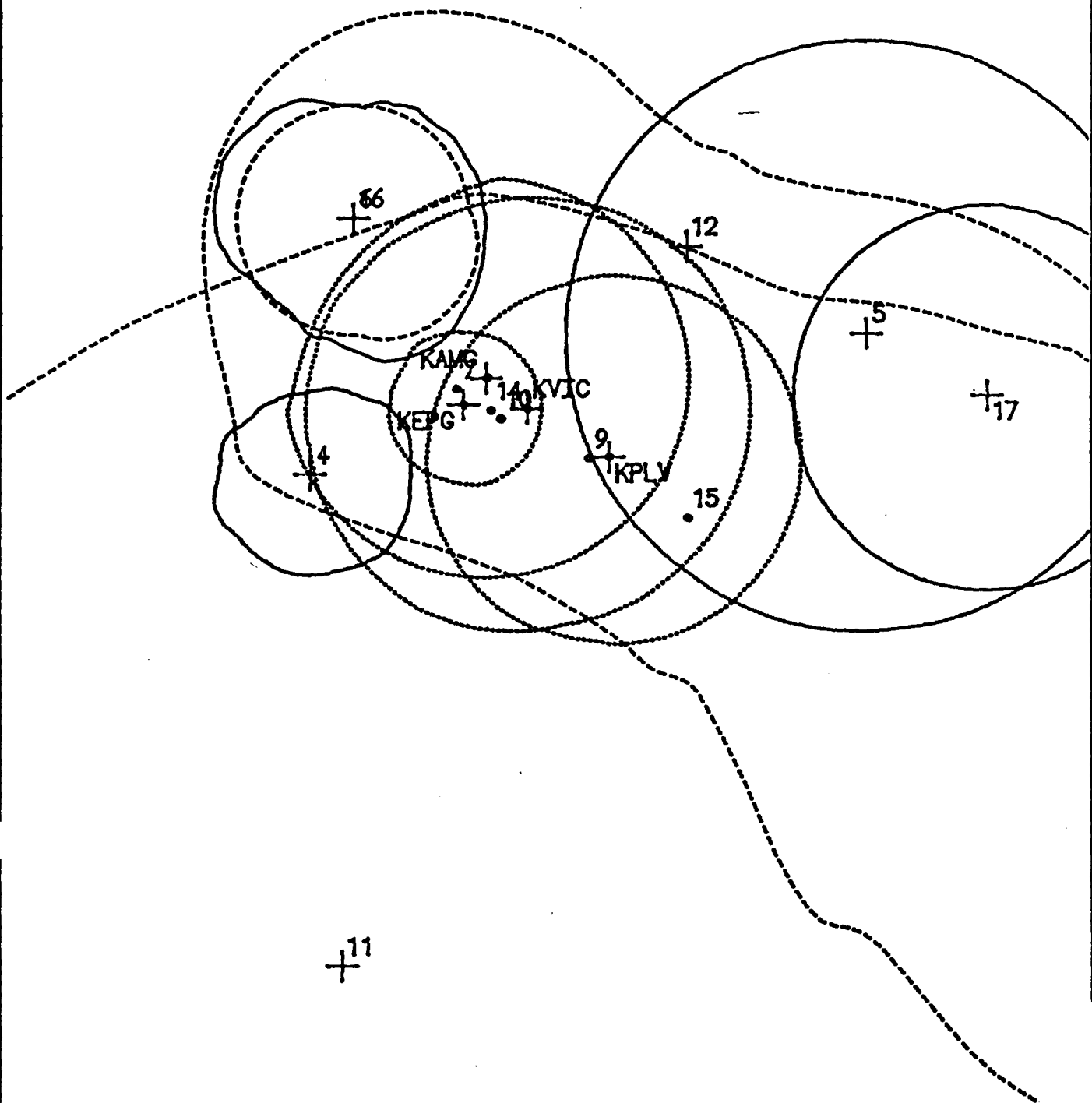


John R. Furr, Communications Consultant

JF&A
COMMUNICATIONS
CONSULTANTS

KVIC-KPLV-KEPG-KAMG
VICTORIA, TX
NARRATIVE

KM: 0 10 20 30 40 50 60 70 80 90 100



JF&A
COMMUNICATIONS
CONSULTANTS

MARKET COUNT CONTOURS

KVIC-KPLV-KEPG-K
VICTORIA
CONTOUR

09-23-1998

John Furr & Associates Inc.

FCC Database Date: 9/98

PAGE 1

# CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KVIC
KVIC LIC	VICTORIA TXBLH-870107KA	236 Class C1	100.0 kW	28-46-55 96-56-30	Source Station	
1 KVLV LIC	VICTORIA TX BLH-910117KB	222 Class A	3.0 kW	28-46-03 96-59-11	5 km 250 dg	37 km 14 km WITHIN
2 KPLV LIC	PORT LAVACA TX BLH-920518KB	227 Class C1	100.0 kW	28-42-22 96-48-03	16 km 121 dg	37 km 49 km WITHIN
3 KVIC LIC	VICTORIA TX BLH-870107KA	236 Class C1	100.0 kW	28-46-55 96-56-30	0 km 0 dg	36 km 21 km WITHIN
4 KHMC LIC	GOLIAD TX BLH-951027KB	240 Class A	6.0 kW	28-40-57 97-18-50	38 km 253 dg	37 km 49 km +17 km
5 KIOXFM LIC	EL CAMPO TX BLH-910221KA	245 Class C1	100.0 kW	28-53-35 96-21-40	58 km 78 dg	37 km 44 km +29 km
6 KVCQ LIC	CUERO TX BLH-960111KC	249 Class C3	25.0 kW	29-04-25 97-14-20	43 km 318 dg	36 km 45 km +17 km
7 KTXNFM LIC	VICTORIA TX BLH-850402KR	254 Class C1	100.0 kW	28-48-46 97-03-45	12 km 286 dg	37 km 18 km WITHIN
8 KEPC LIC	VICTORIA TX BLH-890224KF	265 Class A	2.9 kW	28-47-20 97-03-00	11 km 274 dg	37 km 44 km WITHIN
9 KJUB LIC	BLOOMINGTON TX BLH-940617KF	295 Class C3	25.0 kW	28-42-16 96-50-08	13 km 130 dg	37 km 13 km WITHIN
10 KIXS LIC	VICTORIA TX BLH-860722KB	300 Class C1	100.0 kW	28-46-03 96-59-11	5 km 250 dg	37 km 58 km WITHIN
11 KCTA LIC	CORPUS CHRISTI TX -	1030 Class B	50.0 kW ND	27-56-01 97-15-34	99 km 198 dg	38 km 56 km +74 km
12 KTRM LIC	EDNA TX BL-820527AK	1130 Class D	10.0 kW DA	29-01-40 96-40-05	38 km 44 dg	37 km 62 km +65 km
13 KAMG LIC	VICTORIA TX -	1340 Class C	1.0 kW ND	28-49-49 97-00-33	8 km 309 dg	36 km 43 km WITHIN
14 KNAL LIC	VICTORIA TX -	1410 Class B	0.5 kW ND	28-46-48 97-00-08	6 km 268 dg	37 km 27 km WITHIN
15 KILE LIC	PORT LAVACA TX -	1560 Class D	0.5 kW ND	28-36-45 96-40-07	33 km 125 dg	38 km 15 km WITHIN

JF&A
COMMUNICATIONS
CONSULTANTS

STATION LIST

KVIC-KPLV-KEPG-KAMG
VICTORIA, TX
TABULATION

PAGE 2

FCC Database Date: 9/98

# CALL STATUS	LOCATION STATE	CHANNEL CLASS	POWER	LATITUDE LONGITUDE	DISTANCE BEARING	KVIC 5 mV/m
16 KTXC LIC	CUERO TX -	1600 Class B	0.5 kW ND	29-04-25 97-14-20	43 km 318 dg	36 km 15 km +15 km
KPLV LIC	PORT LAVACA TXBLH-920518KB	227 Class C1	100.0 kW	28-42-22 96-48-03	Source Station	
17 KMKS LIC	BAY CITY TX BLH-900820KA	273 Class C2	50.0 kW	28-47-47 96-09-17	64 km 81 dg	32 km 29 km +1 km

FCC limit of 6 stations total with 4 in one service

Total of 17 stations comprise the market of:

KVIC	LIC	VICTORIA, TX
KPLV	LIC	PORT LAVACA, TX
KEPG	LIC	VICTORIA, TX
KAMG	LIC	VICTORIA, TX

JF&A
COMMUNICATIONS
CONSULTANTS

STATION LIST

KVIC-KPLV-KEPG-KAMG
VICTORIA, TX
TABULATION

SECTION III-B FM Engineering

TECHNICAL SPECIFICATIONS

COPY

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel: 265 Call: KEPG City: Victoria State: TX

2. Class: ☐ A ☐ B1 ☐ B ☒ C3 ☐ C2 ☐ C1 ☐ C ☐ D

3. Antenna Location Coordinates: (NAD 27)

28 ° 47 ' 20 "
97 ° 03 ' 00 "

☒ N ☐ S Latitude
☐ E ☒ W Longitude

4. One-Step Proposal Allotment Coordinates: (NAD 27)

28 ° 46 ' 40 "
97 ° 04 ' 10 "

☐ Not applicable
☒ N ☐ S Latitude
☐ E ☒ W Longitude

5. Antenna Structure Registration Number: See Narrative

☐ Not applicable ☐ FAA Notification Filed with FAA

6. Antenna Location Site Elevation Above Mean Sea Level: 25 meters

7. Overall Tower Height Above Ground Level: 91 meters

8. Height of Radiation Center Above Ground Level: 87 meters (H) 87 meters (V)

9. Height of Radiation Center Above Average Terrain: 88 meters (H) 88 meters (V)

10. Effective Radiated Power: 25.0 kW (H) 25.0 kW (V)

11. Maximum Effective Radiated Power: ☒ Not applicable --- kW (H) --- kW (V)
(Beam-Tilt Antenna ONLY)

12. Directional Antenna Relative Field Values: ☒ Not applicable (Nondirectional)

Rotation: 0 ° ☐ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a " No" response is provided.

CERTIFICATION

**AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 13-16.
PROCEED TO ITEM 17.**

13. **Allotment.** The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203. ☒ Yes ☐ No

See Explanation
in Exhibit No.

14. **Community Coverage.** The proposed facility complies with 47 C.F.R. Section 73.315. ☒ Yes ☐ No

See Explanation
in Exhibit No.
A
15. **Main Studio Location.** The proposed main studio location complies with 47 C.F.R. Section 73.1125 ☒ Yes ☐ No

See Explanation
in Exhibit No.

16. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. ☒ Yes ☐ No

See Explanation
in Exhibit No.
B
- Separation Requirements.**
- a. ☐ 47 C.F.R. Section 73.207.
- Grand fathered Short-Spaced.**
- b. ☐ 47 C.F.R. Section 73.213(a) with respect to station(s): _____

Exhibit No.

Exhibit Required.
- c. ☐ 47 C.F.R. Section 73.213(b) with respect to station(s): _____

Exhibit No.

Exhibit Required.
- d. ☐ 47 C.F.R. Section 73.213(c) with respect to station(s): _____

Exhibit No.

Exhibit Required.
- Contour Protection.**
- e. ☒ 47 C.F.R. Section 73.215 with respect to station(s): KL0L

Exhibit No.
C

Exhibit Required.
17. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.** ☒ Yes ☐ No

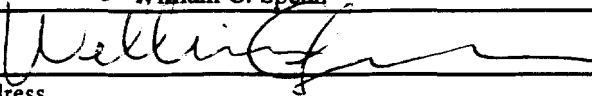
See Explanation
in Exhibit No.

By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.

PREPARER'S CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name William C. Spenn		Relationship to Applicant (e.g., Consulting Engineer) Communications Consultant	
Signature 		Date October 12, 1999	
Mailing Address Box 33081			
City San Antonio		State or Country (if foreign address) TX	ZIP Code 78265
Telephone Number (include area code) 210-648-8011		E-Mail Address (if available) wcspenn@juno.com	

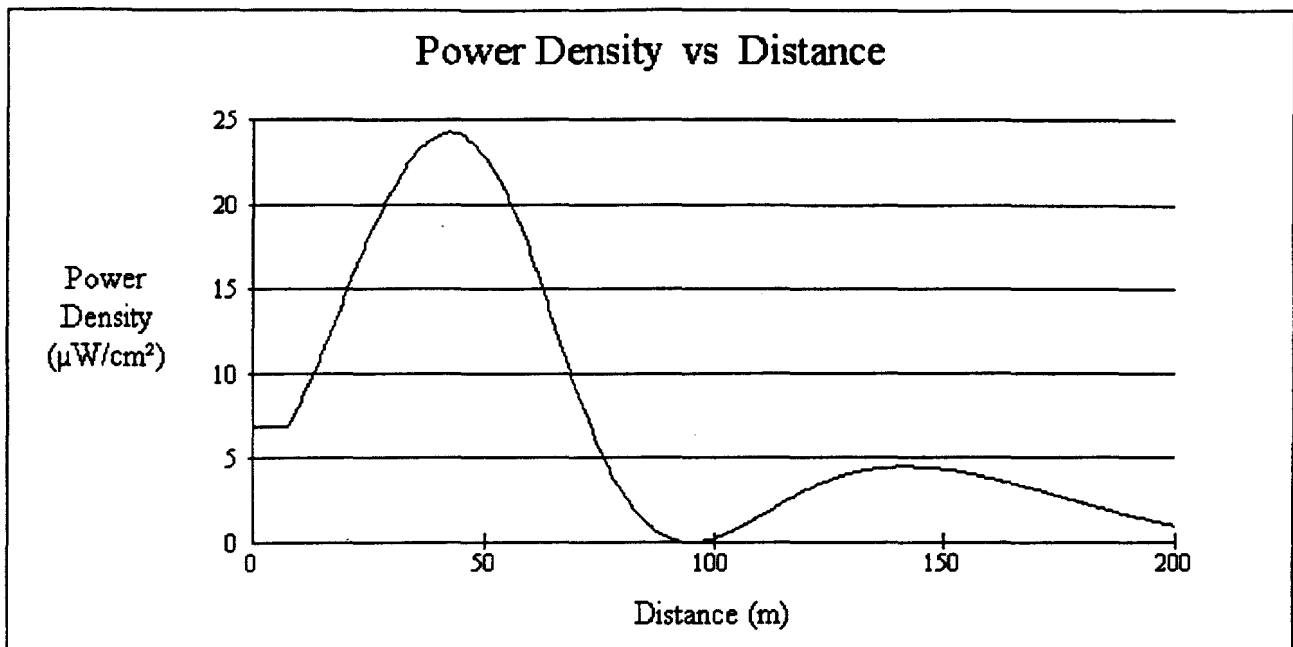
WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT
(U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

The tower used in this application is covered by FCC registration number: 1204337. However, in the process of completing this application, it was discovered that there was a ground elevation error. Therefore, a 7460-1 FAA application was filed dated October 12, 1999, with the FAA office in Fort Worth to correct this matter. The ground elevation, tower height, etc. given herein match the information filed with the FAA. When approved by the FAA, a corrected FCC 854 form will be filed.



DOVE DATA

KEPG
VICTORIA, TX
NARRATIVE



Office of Engineering and Technology

Distance (m):	200	Antenna Type:	ERD or JAMPRO JBCP "Rotator" (EPA)	1
Horizontal ERP (W):	25000	Number of Elements:	3	
Vertical ERP (W):	25000	Element Spacing:	1	
Antenna Height (m):	87			

Here is an ANSI study of the effects of this proposal. The FCC FMMODEL procedure was performed in accordance with the FCC OET Bulletin No. 65, August 1997 and meets the standards of OET-65A are applied for un-controlled area maximum levels. The power will be reduced in accordance with OET-65 or turned off to protect workers on the tower.



DOVE DATA

KEPG
VICTORIA, TX
ANSI STUDY

FM Study for: KEPG-R
Location: VICTORIA, TX
Call City, State
Status Proponent

FCC Database Date: 10/1999
Channel Class: C3
Chan Class Freq kW Latitude Dist.
File Number HAAT Longitude Azm. Clear (km)

>>>>>>> Study For Channel 265 100.9 mHz <<<<<<<<

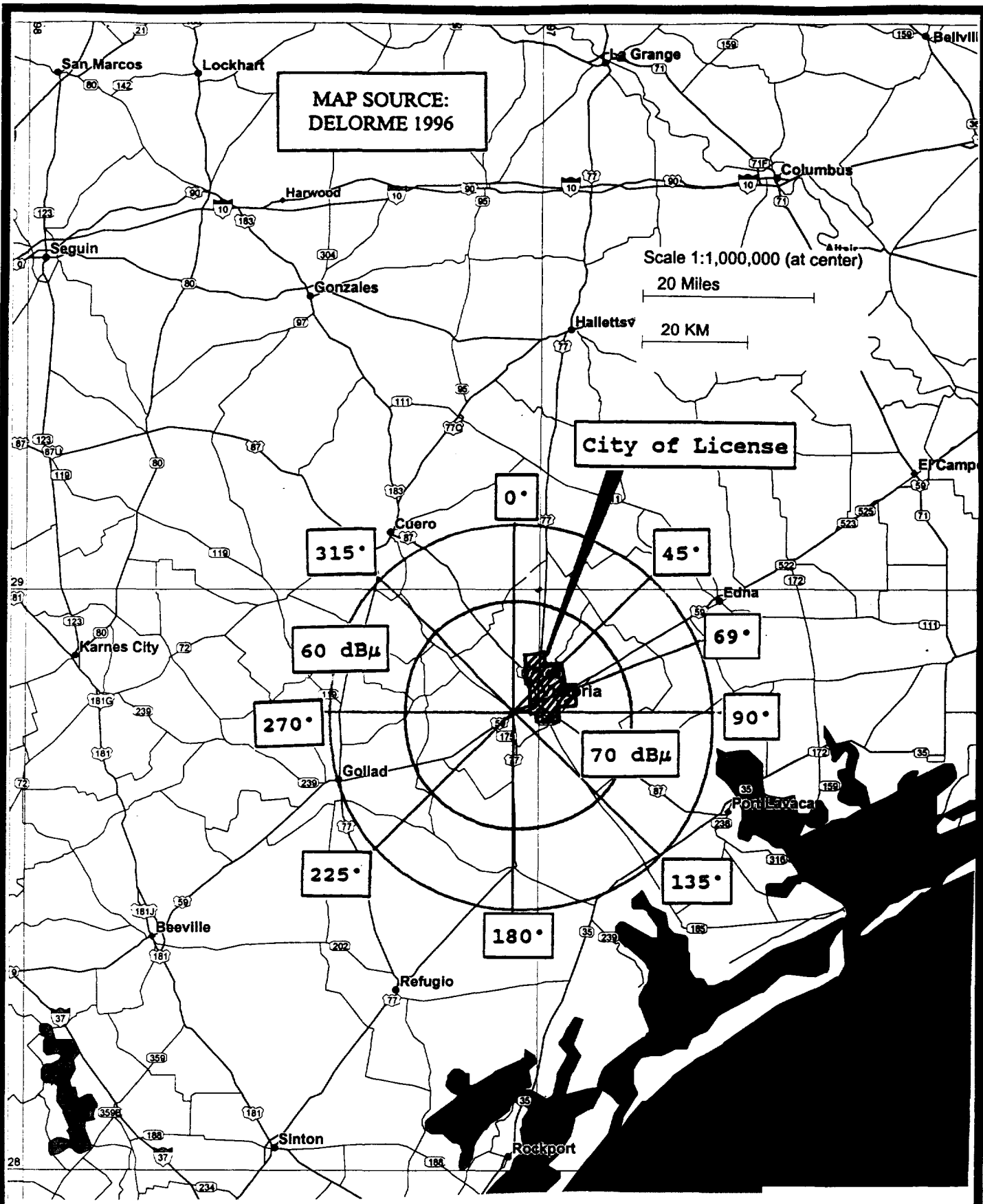
KEPG	VICTORIA, TX	265 A	100.9	2.90	28-47-20	2.3	142	
LIC	Yolanda G. Dorsett	BLH-890224KF	93	97-03-00	57.0	-139.7	SHORT	
		Use of 73.215 for short spacing requires:	119	-116.7	SHORT			
International B per 1992 Agreement with Mexico								
NEW	VICTORIA, TX	265 A	100.9	3.0	28-48-46	3.9	142	
APP	Larry V. Rexna	BPH-971120MK	91	97-03-45	9.9	-138.1	SHORT	
		Use of 73.215 for short spacing requires:	119	-115.1	SHORT			
KLOL	HOUSTON, TX	266 C	101.1	95.	29-34-34	175.61	176	
LIC	KLOL License Limited	BLH-831025AB	585	95-30-36	59.4	-0.39	CLOSE	
KASE	AUSTIN, TX	264 C	100.7	100.	30-19-10	185.0	176	
LIC	KVET Broadcasting Com	BLH-820628AN	363	97-48-06	337.6	+9.0	CLOSE	
ALLOC	REFUGIO, TX	263 A	100.5		28-21-00	51.5	42	
VAC		Docket-98-165	0	97-16-30	203.0	+9.5	CLOSE	
A Filling Window for this channel will be opened in a subsequent order.								
KNCN	SINTON, TX	267 C1	101.3	100.	27-55-24	100.9	76	
LIC	Gulfstar Communicatio	BMLH-575	110	97-25-26	200.2	+24.9	CLEAR	
KONOFM	HELOTES, TX	266 C1	101.1	97.	29-31-25	180.9	144	
LIC	October Communication	BLH-980731KB	302	98-43-25	297.6	+36.9	CLEAR	
Downgrade from Channel 266C								



DOVE DATA

REFERENCE FOR CITY OF LICENSE

KEPG
VICTORIA, TX
NARRATIVE



DOVE DATA

COMMUNITY COVERAGE

KEPG
VICTORIA, TX
EXHIBIT A

FM Study for: KEPG
Location: VICTORIA, TX
Call City, State
Status Proponent

FCC Database Date: 10/1999
Channel Class: C3
Chan Class Freq kW Latitude Dist. Required
File Number HAAT Longitude Azm. Clear (km)

>>>>>>> Study For Channel 265 100.9 mHz <<<<<<<<

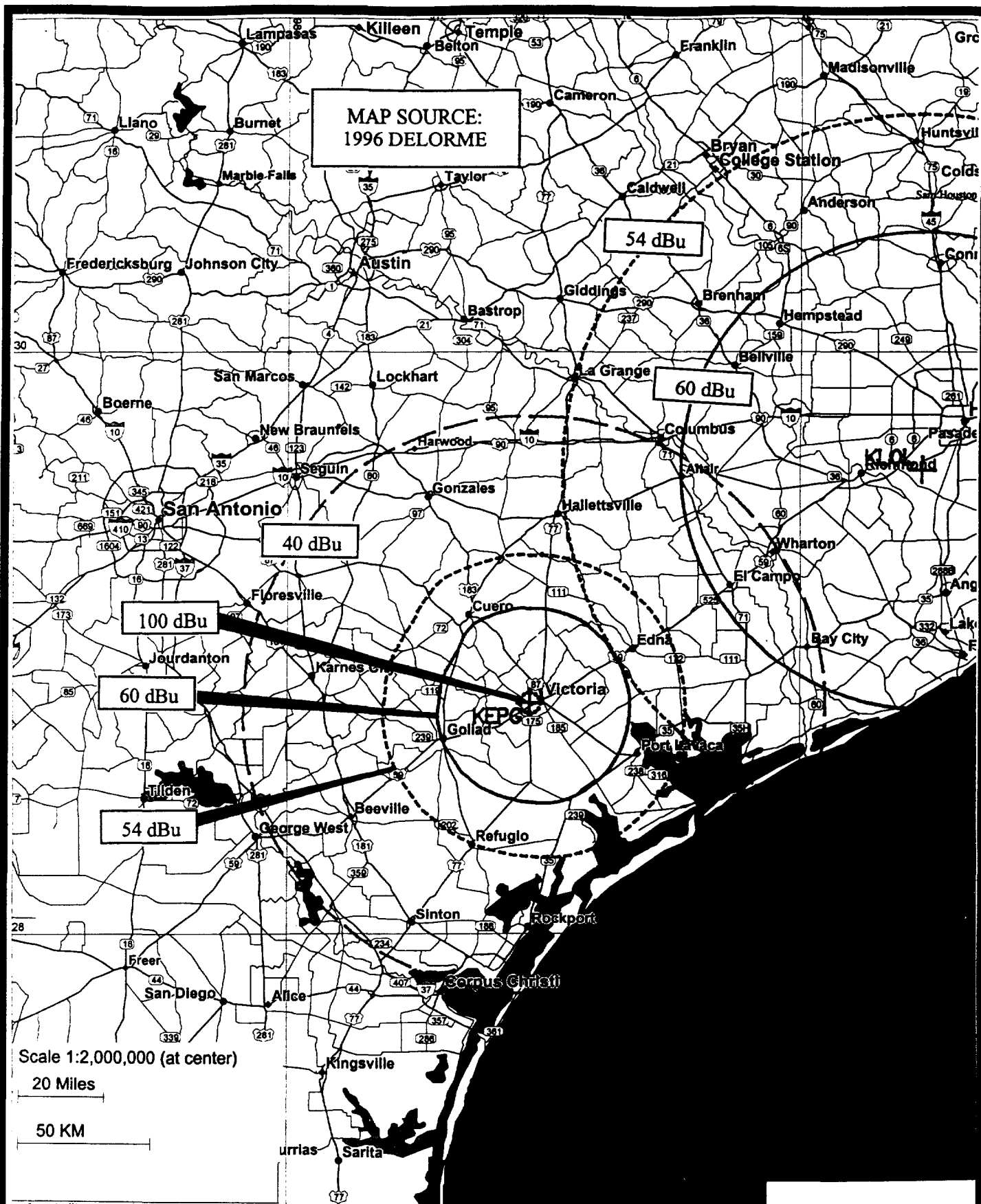
KEPG	VICTORIA, TX	265 A	100.9	2.90	28-47-20	0.0	142	
LIC	Yolanda G. Dorsett	BLH-890224KF	93	97-03-00	0.0	-142.0	SHORT	
International B per 1992 Agreement with Mexico								
NEW	VICTORIA, TX	265 A	100.9	3.0	28-48-46	2.9	142	
APP	Larry V. Rexna	BPH-971120MK	91	97-03-45	335.3	-139.1	SHORT	
Use of 73.215 for short spacing requires: 119 -116.1 SHORT								
KLOL	HOUSTON, TX	266 C	101.1	95.	29-34-34	173.4	176	
LIC	KLOL License Limited	BLH-831025AB	585	95-30-36	59.4	-2.6	SHORT	
Use of 73.215 for short spacing requires: 165 +8.4 CLOSE								
KASE	AUSTIN, TX	264 C	100.7	100.	30-19-10	184.6	176	
LIC	KVET Broadcasting Com	BLH-820628AN	363	97-48-06	336.9	+8.6	CLOSE	
ALLOC	REFUGIO, TX	263 A	100.5		28-21-00	53.4	42	
VAC		Docket-98-165	0	97-16-30	204.4	+11.4	CLOSE	
A Filling Window for this channel will be opened in a subsequent order.								
KNCN	SINTON, TX	267 C1	101.3	100.	27-55-24	102.7	76	
LIC	Gulfstar Communicatio	BMLH-575	110	97-25-26	201.0	+26.7	CLEAR	
KONOFM	HELOTES, TX	266 C1	101.1	97.	29-31-25	182.1	144	
LIC	October Communication	BLH-980731KB	302	98-43-25	297.0	+38.1	CLEAR	
Downgrade from Channel 266C								



DOVE DATA

ALLOCATION STUDY

KEPG
VICTORIA, TX
EXHIBIT B



DOVE DATA

CONTOUR PROTECTION

KEPG
VICTORIA, TX
EXHIBIT C

Project: KEPG Curves: VHF Low Band for 88 mHz to 108 mHz
Source Coordinates: 28-47-20 North 97-03-00 West
This program uses the NGDC 30-Second Database.

Site Elevation AMSL: (82) feet

Antenna HAAT: 88.0 meters

Antenna Center Above Sea Level: 112.0 meters

TV/FM Channel: 265

----- DISTANCES TO CONTOURS IN KILOMETERS -----								
AZM	HAAT	ERP	70 dB	60 dB	100 dB	80 dB	54 dB	40 dB
deg	(m)	(kW)	(km)	(km)	(km)	(km)	(km)	(km)
			50,50	50,50	50,10	50,10	50,10	50,10
0	82	25.00	21.0	35.5	3.7	11.8	56.4	110.5
5	83	25.00	21.1	35.7	3.7	11.8	56.6	110.6
10	84	25.00	21.3	35.9	3.7	11.9	56.9	110.8
15	84	25.00	21.3	35.9	3.7	11.9	56.9	110.8
20	84	25.00	21.3	35.9	3.7	11.9	56.9	110.8
25	85	25.00	21.4	36.1	3.7	12.0	57.1	111.0
30	86	25.00	21.5	36.3	3.8	12.0	57.3	111.2
35	87	25.00	21.6	36.5	3.8	12.1	57.5	111.4
40	85	25.00	21.4	36.1	3.7	12.0	57.1	111.0
45	85	25.00	21.4	36.1	3.7	12.0	57.1	111.0
50	86	25.00	21.5	36.3	3.8	12.0	57.3	111.2
55	86	25.00	21.5	36.3	3.8	12.0	57.3	111.2
60	86	25.00	21.5	36.3	3.8	12.0	57.3	111.2
65	88	25.00	21.7	36.7	3.8	12.2	57.7	111.6
70	89	25.00	21.9	36.9	3.8	12.3	57.9	111.8
75	89	25.00	21.9	36.9	3.8	12.3	57.9	111.8
80	91	25.00	22.1	37.3	3.9	12.4	58.4	112.1
85	92	25.00	22.2	37.5	3.9	12.5	58.6	112.3
90	92	25.00	22.2	37.5	3.9	12.5	58.6	112.3
95	93	25.00	22.3	37.7	3.9	12.5	58.8	112.5
100	94	25.00	22.4	37.9	3.9	12.6	59.0	112.7
105	95	25.00	22.6	38.1	4.0	12.7	59.2	112.8
110	96	25.00	22.7	38.2	4.0	12.7	59.4	113.0
115	98	25.00	22.9	38.6	4.0	12.9	59.8	113.3
120	99	25.00	23.0	38.8	4.0	12.9	60.0	113.5
125	100	25.00	23.1	39.0	4.1	13.0	60.2	113.7
130	101	25.00	23.2	39.1	4.1	13.1	60.4	113.9
135	102	25.00	23.3	39.3	4.1	13.1	60.6	114.0
140	102	25.00	23.3	39.3	4.1	13.1	60.6	114.0
145	103	25.00	23.4	39.5	4.1	13.2	60.7	114.2
150	104	25.00	23.5	39.6	4.1	13.2	60.9	114.4
155	104	25.00	23.5	39.6	4.1	13.2	60.9	114.4
160	104	25.00	23.5	39.6	4.1	13.2	60.9	114.4
165	103	25.00	23.4	39.5	4.1	13.2	60.7	114.2
170	100	25.00	23.1	39.0	4.1	13.0	60.2	113.7
175	97	25.00	22.8	38.4	4.0	12.8	59.6	113.2



DOVE DATA

TABULATIONS

KEPG
VICTORIA, TX
EXHIBIT C

Project: KEPG Curves: VHF Low Band for 88 mHz to 108 mHz

Source Coordinates: 28-47-20 North 97-03-00 West

This program uses the NGDC 30-Second Database.

Site Elevation AMSL: (82) feet

Antenna HAAT: 88.0 meters

Antenna Center Above Sea Level: 112.0 meters

TV/FM Channel: 265

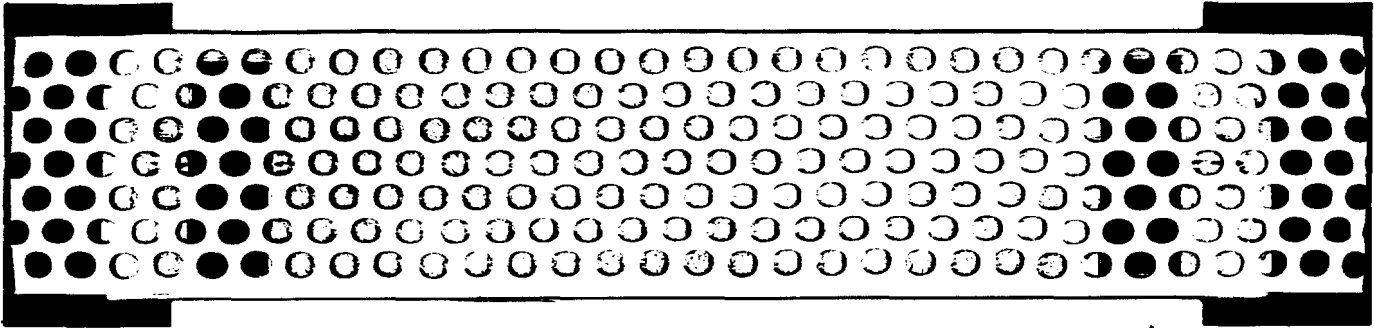
----- DISTANCES TO CONTOURS IN KILOMETERS -----								
AZM	HAAT	ERP	70 dB	60 dB	100 dB	80 dB	54 dB	40 dB
deg	(m)	(kW)	(km)	(km)	(km)	(km)	(km)	(km)
			50,50	50,50	50,10	50,10	50,10	50,10
180	94	25.00	22.4	37.9	3.9	12.6	59.0	112.7
185	93	25.00	22.3	37.7	3.9	12.5	58.8	112.5
190	91	25.00	22.1	37.3	3.9	12.4	58.4	112.1
195	90	25.00	22.0	37.1	3.8	12.3	58.1	112.0
200	90	25.00	22.0	37.1	3.8	12.3	58.1	112.0
205	90	25.00	22.0	37.1	3.8	12.3	58.1	112.0
210	90	25.00	22.0	37.1	3.8	12.3	58.1	112.0
215	89	25.00	21.9	36.9	3.8	12.3	57.9	111.8
220	88	25.00	21.7	36.7	3.8	12.2	57.7	111.6
225	89	25.00	21.9	36.9	3.8	12.3	57.9	111.8
230	87	25.00	21.6	36.5	3.8	12.1	57.5	111.4
235	86	25.00	21.5	36.3	3.8	12.0	57.3	111.2
240	86	25.00	21.5	36.3	3.8	12.0	57.3	111.2
245	86	25.00	21.5	36.3	3.8	12.0	57.3	111.2
250	85	25.00	21.4	36.1	3.7	12.0	57.1	111.0
255	84	25.00	21.3	35.9	3.7	11.9	56.9	110.8
260	83	25.00	21.1	35.7	3.7	11.8	56.6	110.6
265	81	25.00	20.9	35.3	3.6	11.7	56.2	110.3
270	78	25.00	20.5	34.7	3.6	11.5	55.5	109.7
275	77	25.00	20.4	34.5	3.6	11.4	55.2	109.6
280	78	25.00	20.5	34.7	3.6	11.5	55.5	109.7
285	77	25.00	20.4	34.5	3.6	11.4	55.2	109.6
290	76	25.00	20.2	34.4	3.5	11.3	55.0	109.4
295	74	25.00	20.0	34.0	3.5	11.2	54.5	109.0
300	74	25.00	20.0	34.0	3.5	11.2	54.5	109.0
305	74	25.00	20.0	34.0	3.5	11.2	54.5	109.0
310	78	25.00	20.5	34.7	3.6	11.5	55.5	109.7
315	83	25.00	21.1	35.7	3.7	11.8	56.6	110.6
320	87	25.00	21.6	36.5	3.8	12.1	57.5	111.4
325	89	25.00	21.9	36.9	3.8	12.3	57.9	111.8
330	88	25.00	21.7	36.7	3.8	12.2	57.7	111.6
335	86	25.00	21.5	36.3	3.8	12.0	57.3	111.2
340	85	25.00	21.4	36.1	3.7	12.0	57.1	111.0
345	84	25.00	21.3	35.9	3.7	11.9	56.9	110.8
350	85	25.00	21.4	36.1	3.7	12.0	57.1	111.0
355	85	25.00	21.4	36.1	3.7	12.0	57.1	111.0



DOVE DATA

TABULATIONS

KEPG
VICTORIA, TX
EXHIBIT C



FIRST VICTORIA NATIONAL BANK
VICTORIA, TX 77901

2708

VICTORIA RADIOWORKS, LTD.

210-340-7080
8023 VANTAGE DR., STE. 840
SAN ANTONIO, TX 78230-4771

88-255/1131

10/14/1999

PAY TO THE
ORDER OF FCC

\$ 725.00

Seven hundred twenty-five and 00/100

DOLLARS

FCC
445 12 Street SWd
Washington DC 20554

MEMO Form 301 Fee KEPG-FM (Tax ID: 74-2889539)

⑈002708⑈ ⑆113102552⑆ ⑈03 39970⑈

